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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PENDLETON DIVISION

OREGON FIREARMS FEDERATION, INC., et  
al.,

Plaintiffs,

v.

KATE BROWN, et al.,

Defendants.

Case No. 2:22-cv-01815-IM (*Lead Case*)  
Case No. 3:22-cv-01859-IM (*Trailing Case*)  
Case No. 3:22-cv-01862-IM (*Trailing Case*)  
Case No. 3:22-cv-01869-IM (*Trailing Case*)

CONSOLIDATED CASES

**DECLARATION OF KELLY PARKMAN  
IN SUPPORT OF AMICUS CURIAE  
OREGON HUNTERS ASSOCIATION  
AND DUCKS UNLIMITED  
MEMORANDUM IN SUPPORT OF  
PRELIMINARY INJUNCTION**

MARK FITZ, et al.,

Plaintiffs,

v.

ELLEN F. ROSENBLUM, et al.,

Defendants.

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KATERINA B. EYRE, TIM FREEMAN,  
MAZAMA SPORTING GOODS, NATIONAL  
SHOOTING SPORTS FOUNDATION, and  
OREGON STATE SHOOTING ASSOCIATION,

Plaintiffs,

v.

ELLEN F. ROSENBLUM, Attorney General of  
Oregon, and TERRI DAVIE, Superintendent of  
the Oregon State Police,

Defendants.

DANIEL AZZOPARDI, et al.,

Plaintiffs,

v.

ELLEN F. ROSENBLUM, et al.,

Defendants.

I, Kelly Parkman, hereby declare as follows:

1. I am over the age of 18 years, and I am qualified to submit this Declaration on behalf of Amicus Curiae. I make this Declaration based on my personal knowledge.

2. I am President of the Hoodview Chapter of Oregon Hunters Association. I participate as an instructor in the OHA Learn To Hunt program and I am also a certified instructor with the R3 outreach program for the Oregon Department of Fish & Wildlife (“ODFW”). I help to coordinate and organize our banquet fundraisers. These banquets raffle or auction firearms as a substantial component of their fundraising activity.

3. In working with the Learn To Hunt program, I regularly work with new hunters of all ages and backgrounds who are interested in hunting but have no experience. I help train them to hunt safely, legally and ethically, and I have become familiar with their needs and concerns. The fastest growing segment of new hunters are women, minorities, first generation legal immigrants, and other people with no hunting heritage. Without these programs, they do not have anyone to guide them. BM 114 makes owning a hunting rifle or shotgun so daunting, that most would-be hunters, with no one to guide them, will never hunt. Yet existing hunters, predominantly white males, will continue hunting.

4. Most participants in the Learn To Hunt program purchase a traditional hunting rifle before, during, or shortly after their participation. These purchases are made legally and, along with their ammunition purchases contribute to generating Pittman-Robertson (“PR”) conservation funds for the benefit of habitat and wildlife. New hunters also purchase hunting licenses and tags which directly fund ODFW who is the State’s steward for habitat and wildlife in Oregon.


5. As both new and experienced hunters become frustrated in their ability to engage in hunting activity due to the harsh restrictions of BM 114, Oregon will see a sharp decline in PR dollars generated by the sale of licenses, tags, rifles, and ammunition. Thus, BM 114 harms habitat and wildlife. It is also a direct hit to ODFW who receives a majority of its budget from these sources. ODFW habitat and wildlife efforts suffer, along with its employees.

6. Our activities that will be harmed include habitat restoration and maintenance projects, the Learn To Hunt program, and hunter safety instruction. All of which provide a substantial public benefit that will be lost until we can resume our usual activities.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on January 9, 2023

By:

  
Name: Kelly Parkman

### CERTIFICATE OF SERVICE

In accordance with Fed. R. Civ. P. 5(b)(2)(E) and LR5-1, I hereby certify that on January 11, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

DATED this 13th day of January 2023.

LYNCH MURPHY MCLANE LLP

/s/ Michael R. McLane

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